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May 22, 2023

The Honorable Judge Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS)

Dear Judge Swain:

This law firm represents Tien Chih Wang, a defendant in *USA v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS). On April 13, 2021, a final judgment was entered against Mr. Wang for time served, three years of supervised release, forfeiture, community service, a fine and a special assessment. *See*, Dkt. No. 235. He remains fully compliant on all of his obligations under the judgement.

Mr. Wang respectfully requests a modification of the conditions of his supervised release to permit him to travel to Taiwan with his two sons. His 87 year-old mother is in failing health and he would like the ability to visit with her. The duration of the trip would be from August 4, 2023 to September 4, 2023. He will stay at his parents' home. A full itinerary will be provided to the Government and to Probation upon request.

In recognition of the low risk he presents, Mr. Wang has been placed on the "low intensity unit" for supervision. As he quickly fully complied with both the forfeiture and community service requirements mandated at sentencing, there is no risk of flight.

I have spoken to AUSA Thane Rehn as well as Probation Officer Lisa Famularo regarding this request and neither the Government nor Probation has an objection to Mr. Wang's travel.

Thank you for the Court's time and consideration. I remain available for a conference should Your Honor deem it necessary.

The foregoing request is granted. Mr. Wang shall provide Probation with a full itinerary in advance of his travels. DE 259 is resolved.
SO ORDERED.

5/22/2023

Laura Taylor Swain, Chief USDJ
cc: Nathan Rehn, A.U.S.A.

Respectfully submitted,

ROBERT C. GOTTLIEB
& ASSOCIATES PLLC

Robert C. Gottlieb